

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

TITLE V PROPOSED PERMIT NO. V-06-043, RENEWAL
MARTIN COUNTY COAL CORPORATION

INEZ, KENTUCKY

APRIL 2, 2007

MIN WANG, REVIEWER

SOURCE I.D. #: 021-159-0002

SOURCE A.I. #: 2984

ACTIVITY #: APE20040001

SOURCE DESCRIPTION:

Martin County Coal Corporation is an underground coal mining company and this permit is for the surface coal preparation. The coal preparation plant has 1 Receiving Hopper (EP3, 800 tons/hr), 2 Primary Crushers (EP6 & 12, 500 tons/hr each), 21 Conveyor Transfer Points (EP1 & 2, 1200 tons/hr each; EP 4, 5, 11, 13-15, 22, 27, 32, 800 tons/hr each; EP 7-9, 16, 20, 1500 tons/hr each; EP 18 & 19, 650 tons/hr each; EP 29&30, 2800 tons/hr each), 3 Open Stockpiles (EP10, 17, & 28, 800 tons/hr each), 1 Rail Loadout (EP31, 2800 tons/hr), 1 Truck Loadout (EP23, 800 tons/hr), 1 Truck Dump (EP26, 800 tons/hr), 1 Thermal Dryer (EP24 & 25, 421 tons/hr for coal dried and 5 tons/hr for coal burned), and the other operations, such as Enclosed Preparation Plant (EP21) and Haul Roads (EP33-35). All processes described above were constructed in 1969.

Since Potential to Emit of criteria pollutants, such as PM, VOCs, SO_x, and NO_x, exceeds 100 TPY, Martin County Coal Corporation is a major source and title V permit is needed.

Initial Title V Permit – The initial permit, V-97-004, was issued to the source on July 25, 1997 for the operation of a source-wide processes.

PUBLIC AND U.S EPA REVIEW:

On February 14, 2007, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Mountain Citizen* in Martin county, Kentucky. The public comment period expired 30 days from the date of publication.

No comments received

No comments were received during this period. The permit is now being issued as a proposed permit. The U.S. EPA has 45 days from the date of the issuance to submit comments. If no comments are received during this period, the Division will consider the permit final as conditioned.

COMMENTS:

Type of control and efficiency

The controls implemented at the source are considered adequate to sufficiently control emissions. EP24 & 25: Thermal Dryer listed under 401 KAR 61:020, Existing Process Operations, is controlled by a wet scrubber with control efficiencies of PM and PM₁₀ at 97.5% determined by a performance testing in 1997. The assumed control efficiency for the points listed under 401 KAR 63:010, Fugitive emissions, is 90% and are controlled by water sprays or enclosure.

Emission factors and their source

AP42, and stack test.

Applicable regulation

401 KAR 52:020, Title V Permits, applies to the source because the source emits more than 100 tons/year of several criteria pollutants, such as PM, VOCs, SO_x, and NO_x.

401 KAR 61:020, Existing Process Operations, applies to the source because there is equipment controlled by wet scrubber which was constructed prior to July 2, 1975.

401 KAR 63:010, Fugitive Emissions, applies to the source because there are processes that release fugitive emissions.

Non-Applicable regulation

401 KAR 60:005, Standards of performance for new stationary sources, which incorporates by reference 40 CFR 60.250 (40 CFR Subpart Y), does not apply because the processes related to coal crushing and thermal drying were constructed before October 24, 1974.

EMISSION AND OPERATING CAPS DESCRIPTION:

EP24 & 25: Thermal Dryer listed under State Regulation 401 KAR 61:020, Existing Process Operations, applicable prior to July 2, 1975, have an opacity (any continuous emissions into the open

air shall not equal or exceed forty percent (40%) opacity based upon a six-minute average) and mass emission limits (particulate matter emissions into the open air shall not exceed 67.05 lbs/hour based upon a three-hour average) resulting from the application of this regulation. As a result, the equipment controlled by 401 KAR 61:020, Existing process operations, will be required to use a wet scrubber and be operated and maintained in accordance with the manufacturer's recommendations.

The other processes listed under State Regulation 401 KAR 63:010, Fugitive emissions, shall be controlled, by utilizing wet suppression, and enclosures so as to keep particulate emissions from crossing the lot line of the property.

PERIODIC MONITORING:

01 (1,2)	Conveyors (2) and Transfer Points	1200 tons per hour, each.
(4,5,11,13-15, 22,27,32)	Conveyors (9) and Transfer Points	800 tons per hour, each.
(7-9,16,20)	Conveyors (5) and Transfer Points	1500 tons per hour, each.
(18,19)	Conveyors (2) and Transfer Points	650 tons per hour, each.
(29,30)	Conveyors (2) and Transfer Points	2800 tons per hour, each.
(26)	Truck Dump	800 tons per hour.
(3)	Receiving Hopper	800 tons per hour.
(6,12)	Primary Crushers (2)	500 tons per hour, each.
(10,17,28)	Stockpiles (3)	800 tons per hour, each.
	(Raw and Clean Coal)	
(23)	Truck Loadout	800 tons per hour.
(31)	Unit Train Loadout	2800 tons per hour.
(33-34)	Haul Road and Yard Area (Paved)	
(35)	Haul Road and Yard Area (Unpaved)	

1. Applicable Regulations:

State Regulation 401 KAR 63:010, Fugitive emissions

2. Compliance Requirements:

On an operating daily basis, the Permittee shall inspect the above listed emission units for potential fugitive emissions. If there is a potential for fugitive emissions then reasonable precautions listed as follows shall be taken:

- 1) Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
- 2) Application and maintenance of asphalt, oil, water, or suitable chemicals on roads, materials stockpiles, and other surfaces which can create airborne dusts;
- 3) Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials, or the use of water sprays or other measures to suppress the dust emissions during handling.
- 4) Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne;
- 5) The maintenance of paved roadways in a clean condition;
- 6) The prompt removal of earth or other material from a paved street which earth or other material has been transported thereto by trucking or earth moving equipment or erosion by water.

02 (24, 25)

Coal Fired Thermal Dryer

421 tons per hour, coal dried.

5 tons per hour, coal burned.

1. Applicable Regulations:

State Regulation 401 KAR 61:020, Existing process operations.

2. Compliance Requirements:

- 1) The permittee shall monitor the coal dried and hours of operation on a daily basis.
- 2) For each stack, vent or control system:
 - a) Daily observations of visible emissions during operation of associated equipment.
 - b) Observations of visible emissions during all periods of control equipment malfunction.
 - c) If visible emissions are seen during the observation, Method 9 shall be used to determine the opacity.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.